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Husky Oil

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July 12, 1990

U.S. Environmental Protection Agency
Public Docket A-90-16
Room M-1500
401 M Street S.W.
WASHINGTON, D.C. 20460
U.S.A.

ATTENTION: **Mary T. Smith, Director**
Field Operations & Support Division (EN-397F)

SUBJECT: MMT (METHYLCYCLOPENTADIENYL MANGANESE TRICARBONYL)

Dear Ms. Smith:

This letter is with reference to Ethyl Corporation's application to permit refiners to use MMT in unleaded gasoline.

Our company, **Husky Oil Operations Ltd.** is a fully integrated Canadian oil company. We operate a 10,000 Barrels per day refinery in Prince George, British Columbia, Canada and market gasoline products in 347 sales outlets in Western and Central Canada.

Summarized below are our comments regarding the use of MMT:

1. We have been using MMT as a gasoline octane enhancing additive in our refinery for the last ten years, and found it to be very effective. Over these years, no problems associated with its use have been reported.

2. The use of MMT has permitted our reformer unit, the process unit which produces our incremental octane, to run at a much lower severity. The lower severity operation has directionally reduced the aromatics and benzene concentration in our gasoline products.

   As well, the lower severity increases our liquid yield per barrel of crude processed resulting in lower crude usage.

3. The addition of MMT has provided increased flexibility in our gasoline blending operation by providing an additive to use as a "trim" to correct octanes when a batch being blended is below octane specifications resulting in a more efficient operation.

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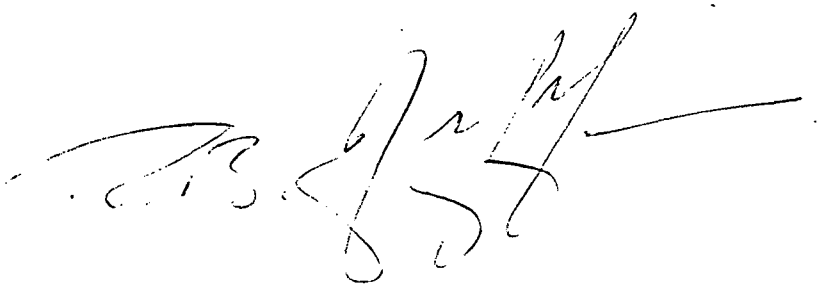
4. We have not received any complaints from our customers that are related to MMT.

In summary, we support the use of MMT in gasoline. Not only is it a cost effective octane source, but also provides increased flexibility in our refining operation.

Should you need further information, please feel free to contact me at (604) 298-6138.

Yours truly,



R.B. Jeffries, Ph.D., P.Eng.
Manager, Engineering

RBJ/dmm